

1 IN THE UNITED STATES DISTRICT COURT FOR THE
2 WESTERN DISTRICT OF MISSOURI
3 RACHEL AUMICK, Individually) Case No: 6:21-cv-03072-BP
4 and on behalf of the Heirs at)
5 Law of SHANE AUMICK, Deceased,)
6 Plaintiff)
7 vs.)
8)
9 DOUGLAS COUNTY, MISSOURI, et al,))
10 Defendants.)

11 VIDEO-RECORDED DEPOSITION OF JEREMY JEFFREY
12 Taken via remote means whereby all parties
13 appeared via Zoom on June 29, 2022 at 9:00 a.m.
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1 article that I can point you to because there are
2 multiple.

3 **Q. Okay. I thought you mentioned University of Maryland.**

4 A. I mentioned University of Maryland because that's
5 where all the fluid resuscitation guidelines come
6 from. We didn't have them. There were multiple
7 articles and then the next thing you know now we have
8 guidelines. University of Maryland, no, ma'am,
9 there's multiple articles out there. All you have to
10 do is go to Google Scholar and go to excited delirium
11 and see multiple. I try not to read anything that
12 isn't peer-reviewed. Vanderbilt Medical Center has a
13 lot of stuff out there if you want to go look at some
14 stuff.

15 **Q. Let's talk about something that is a medical**
16 **diagnosis. What do you know or training have you had**
17 **in regard to positional asphyxia?**

18 A. We've had a lot of training on positional asphyxia in
19 transport. We do not -- in my service we do not
20 transport patients in a prone position unless there is
21 a medical condition that causes it. Impaled object,
22 the patient has something, an open wound that we
23 cannot transport them on their back and even then we
24 try to do it in the lateral position. However, that's
25 not always possible either. But it is absolutely

1 something that we do train on. Positional asphyxia is
2 something we try to stay away from. And I don't allow
3 in my service to transport anyone in a prone position.

4 **Q. How long have you been receiving training on**
5 **positional asphyxia?**

6 A. Oh, man, probably the last 12 years more specifically
7 we really focused on it. Prior to that we always
8 receive training in it. However, probably in the last
9 10 to 12 years we really focused on things like that.
10 And over the last years with COVID that kind of
11 changed again because they wanted us to start
12 transporting patients prone so we had another
13 discussion. Honestly, ma'am, throughout my whole
14 career probably on positional asphyxia and
15 transporting patients in a prone position.

16 **Q. Okay. Are you aware of any training prior to April of**
17 **2020 that EMT Wood had regarding positional asphyxia?**

18 A. No, ma'am, I did not review his training records to
19 know where his training was.

20 **Q. Would it surprise you EMT Wood would testify he had**
21 **not had any training as it related to positional**
22 **asphyxia prior to April 2020?**

23 A. Ma'am, it would really depend on how it was worded in
24 his training. Positional asphyxia, you know, I would
25 not be surprised if he didn't know the term. I would